

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
No. 25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., et al.

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

DEFENDANT FDEM’S NOTICE OF SUPPLEMENTAL AUTHORITY

Defendant FDEM respectfully submits this notice of supplemental authority relating to Plaintiffs’ counsel’s representation, at the hearing on July 30, 2025, that “one-quarter to one-third” of the TNT Airport property lies in Miami-Dade County. Attached hereto as Exhibit 1 is a Geographic Information System map taken from satellite imagery of the TNT Airport, which permits the user to measure the area of the property from an overlaid polygon. This shows that only **2.2%** of the land on the site is in Miami-Dade County—97.8% of the land on the site is in Collier County, along with all facilities and improvements for the detention center.

Dated: August 1, 2025

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Respectfully submitted,

s/ Jesse Panuccio
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*Counsel for Kevin Guthrie, in his official
capacity as Executive Director of the Florida
Division of Emergency Management*

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2025, the foregoing was filed with the Clerk of Court using CM/ECF, which will serve a Notice of Electronic Filing on all counsel of record.

s/ Jesse Panuccio
Jesse Panuccio